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April 6, 2023

The Honorable Christopher C. Conner
United States District Court for the Middle District of PA
228 Walnut Street
Harrisburg, PA 17108

RE: White, Johnjuanv. Dauphin County, et al.
Docket No.: U.S.M.D. of PA; No. 1:22-cv-01241
Our File No.: 03258.00166

Your Honor:

Please accept this brief response on behalf of Defendants McClerg, Ventura and Pecho relating to the letter of Plaintiff's Counsel dated April 5, 2023, concerning an alleged discovery dispute.

While Plaintiff served discovery on those County Defendants represented by Lavery Law, and the PrimeCare Defendants represented by John Ninosky, Plaintiff failed to serve any written discovery on Defendants McClerg, Ventura, or Pecho. On Wednesday, March 29, undersigned counsel spoke with Plaintiff's Counsel concerning scheduling depositions for Defendants McClerg, Ventura and Pecho and at that time, she voiced satisfaction with the progress being made.

I stand ready to address any questions or concerns that you have with regard to the above.

Sincerely,

A handwritten signature in black ink, appearing to read 'DLC', with a long horizontal flourish extending to the right.

Donald L. Carmelite

DLC:men

cc: All Counsel of Record via ECF